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TO A DOCKET ROOM
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(931) 388-6031

April 23, 2004

VIA HAND DELIVERY

Deborah Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219

Re: Petition of Chattanooga Gas Company for Approval of Adjustment
of its Rates and Charges and Revised Tariff
Docket Number 04-00034

Data Requests to Interveners

Dear Chairman Tate:

Enclosed you will find 14 copies of Data Requests that Chattanooga Gas Company has served on the Interveners in this docket, i.e., the Consumer Advocate and Protection Division, Chattanooga Manufacturers' Association and Gas Technology Institute.

Sincerely,



D. Billye Sanders
Attorney for Chattanooga Gas Company

DBS/hmd
Enclosures

cc: Parties of Record
Archie Hickerson
Steve Lindsey
John Ebert, Esq.
Elizabeth Wade, Esq.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE

PETITION OF CHATTANOOGA GAS
COMPANY, FOR APPROVAL OF
ADJUSTMENT OF ITS RATES AND
CHARGES AND REVISED TARIFF

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DOCKET NO 04-00034

**DATA REQUESTS OF CHATTANOOGA GAS COMPANY TO THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Chattanooga Gas Company ("CGC") hereby serves its Data Requests to The Consumer Advocate and Protection Division of the Office of Tennessee Attorney General ("CAPD") to be answered in writing under oath.

DEFINITIONS

1. CAPD means The Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General, its employees, agents, representatives, and all other persons acting or purporting to act on behalf of the CAPD.
2. The terms "you and "your" refer to the CAPD.
3. The term "person" means any natural person, corporation, corporate division, partnership, limited partnership, other unincorporated association, trust, government agency, or entity.

4. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter

5. The term “identify” and “identity” as used herein, with respect to any person, means to provide their name, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity those terms mean to provide the legal name of the entity and any assumed names, the current address of the principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the parties to the document (if any), the nature of the document and the title (if any) of the document.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged).
- d) the identity of the author(s) and/or preparer(s) and the address(es) (if any) of any document withheld as privileged.

2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within the CAPD's possession, custody or control as well as in the possession, custody or control of the CAPD's agents, attorneys, consultants or other third parties from which such documentation may be obtained.

3. If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for your inability to respond fully. If you object to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

4. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.

5. The answer to each data request should first restate the question asked and also provide the name and title and business address of the person or persons supplying the information.

DATA REQUESTS

1. Provide detailed workpapers, cross referenced to source documents, which show the computation of each amount on the CAPD's exhibits to be filed in this docket that is different from the corresponding amount presented on Chattanooga Gas Company's exhibits filed in this docket.
2. Provide copies of any written communications and complete details of any other communications that any member of the CAPD staff has had with any Chattanooga Gas Company customer or a consultant employed by any such customer relative to this docket. The information provided should include identification of the parties to the communication.
3. Produce copies of any written communications received by the CAPD from any Chattanooga Gas Company customer relative to this docket. The information provided should include identification of the parties to the communication.
4. Provide complete details of any discussions or communications that any CAPD employee or any witness that may appear on behalf of the CAPD in any hearing in this docket has had concerning this docket with any person not presently employed by the Office of the Tennessee Attorney General and Reporter, who is not a paid consultant of the CAPD. The information provided should include identification of the parties to the communication.

5. Produce copies of any written communications relating to this docket that any CAPD employee or witness that may appear on behalf of the CAPD in any hearing in this docket issued to or received from any person not presently employed by the Office of the Tennessee Attorney General and Reporter, who is not a paid consultant of the CAPD. The information provided should include identification of the parties to the communication.

6. Produce copies of all documents or things shown to, delivered to, received from, relied upon, or prepared by any witness that may appear on behalf of the CAPD in any hearing in this docket, which are related to the witness (es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that witness for review in connection with testimony and opinions. Please indicate which witness identified in question 15 below received, relied upon or prepared the documents/information provided.

7. Produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any witness that may appear on behalf of the CAPD in any hearing in this docket in evaluating, reaching conclusions or formulating an opinion in this matter. Please indicate which witness identified in question 15 below received, relied upon or prepared the documents/information provided.

8. Produce copies of any and all testimony entered in any regulatory proceeding by any witness that may appear on behalf of the CAPD in any hearing in this docket.

9. Produce a copy of all articles or papers written by or co-written by any witness that may appear on behalf of the CAPD in any hearing in this docket, whether published or not.

10. Produce copies of all surveys of Chattanooga Gas Company's or other regulated gas utility's customers conducted by or on behalf of the CAPD.

11. Produce copies of all stipulations or settlement agreements entered into by the CAPD and any public utility regulated by the Tennessee Regulatory Authority since 1996.

12. If the CAPD proposes a rate design that is different from the design proposed by Chattanooga Gas Company produce copies of all workpapers, cross referenced to source documents, which support the CAPD's proposed rate design.

13. Identify any paid consultant(s) that the CAPD has or will consult with regarding this docket.

14. Identify any consultants that the CAPD contacted regarding this docket, but did not hire.

15. Identify each witness that will testify on behalf of the CAPD in this docket.

16. Identify the issues that each witness named in question 15 will address in his/her testimony.

Respectfully Submitted,

Chattanooga Gas Company
By:



D. Billye Sanders, Esq.
Waller Lansden Dortch & Davis
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Company
511 Union Street, Suite 2700
Nashville, TN 37219
615-244-6380
Attorney Chattanooga Gas Company

CERTIFICATE OF SERVICE

I, hereby certify that on this 23rd day of April, 2004, a true and correct copy of the foregoing was delivered by hand delivery, or U.S. mail postage prepaid and email to the other Counsel of Record listed below.



D. Billye Sanders, Esq.

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Tim Phillips
Assistant Attorney General
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE

PETITION OF CHATTANOOGA GAS
COMPANY, FOR APPROVAL OF
ADJUSTMENT OF ITS RATES AND
CHARGES AND REVISED TARIFF

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DOCKET NO 04-00034

**DATA REQUESTS OF CHATTANOOGA GAS COMPANY TO
CHATTANOOGA MANUFACTURERS' ASSOCIATION**

Chattanooga Gas Company ("CGC") hereby serves its Data Requests to Chattanooga Manufacturers' Association ("CMA") to be answered in writing under oath.

DEFINITIONS

1. "CMA" or "Chattanooga Manufacturers' Association" means the Chattanooga Manufacturers' Association, and its members, including, but not limited to its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of CMA.

2. The terms "you and "your" refer to CMA.

3. The term "person" means any natural person, corporation, corporate division, partnership, limited partnership, other unincorporated association, trust, government agency, or entity.

4. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged).
- d) the identity of the author(s) and/or preparer(s) and the address(es) (if any) of any document withheld as privileged.

2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within CMA's possession, custody or control as well as in the possession, custody or control of CMA's agents, attorneys, members or other third parties from which such documentation may be obtained.

3. If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for your inability to respond fully. If you object to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

4 These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.

5. The answer to each data request should first restate the question asked and also provide the name and title and business address of the person or persons supplying the information.

DATA REQUESTS

1. Please provide the name, address, telephone number and name of the president or other comparable officer of each member of the CMA.

2. Please provide a copy of the organizational document creating the CMA, e.g., the Charter or Articles of Organization.

3. Please provide a copy of the Bylaws of CMA or other comparable documents pertaining to governance.

4. Please describe how CMA determines what positions it will take in the Chattanooga Gas Company rate proceeding, TRA Docket Number 04-00034. Your description should include whether all the members vote on what positions are taken or whether this authority is delegated to others.

5. Please list the names of CMA members that have obtained gas pursuant CGC's industrial tariffs within the last 15 months, i.e. January 1, 2003 through March 31, 2004.

6. Please list the names of members of CMA who have subscribed to CGC's commercial tariffs within the last 15 months i.e. January 1, 2003 through March 31, 2004.

7. Please list the names of members of CMA who are not currently customers of CGC.

8. Please list any CMA members who do not anticipate being customers of CGC during the period July 26, 2004 through July 5, 2005.

9. Provide detailed workpapers, cross referenced to source documents, which show the computation of each amount on any exhibit that is to be filed by the Chattanooga Manufacturers' Association that is different from the corresponding amount presented on Chattanooga Gas Company's exhibits filed in this docket.

10. Produce copies of any written communications that the Chattanooga Manufacturers' Association has issued to or received from any Chattanooga Gas

Company customer that is not a member of the Chattanooga Manufacturers' Association.

11. Produce copies of all documents or things shown to, delivered to, received from, relied upon, or prepared by any witness that may appear on behalf of the Chattanooga Manufacturers' Association in any hearing in this docket, which are related to the witness (es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that witness for review in connection with testimony and opinions.

12. Produce a copy of all documents, which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any witness, that may appear on behalf of the Chattanooga Manufacturers' Association in any hearing in this docket in evaluating, reaching conclusions or formulating an opinion in this matter.

13. Produce copies of any and all testimony and exhibits entered in any proceeding pertaining to a regulated utility by any witness that may appear on behalf of the Chattanooga Manufacturers' Association in any hearing in this docket.

14. Produce a copy of all articles or papers written by or co-written by any witness that may appear on behalf of the Chattanooga Manufacturers' Association in any hearing in this docket, whether published or not.

15. Produce copies of all stipulations or settlement agreements entered into by the Chattanooga Manufacturers' Association in any proceeding before the Tennessee Regulatory Authority since 1996.

16. If the Chattanooga Manufacturers' Association proposes a rate design that is different from the design proposed by Chattanooga Gas Company, produce copies of all workpapers, cross referenced to source documents, which support the Chattanooga Manufacturers' Association proposed rate design.

17. If the Chattanooga Manufacturers' Association intends to introduce a class cost of service study in this docket, provide the complete study including all workpapers cross referenced to source documents.

18. If the Chattanooga Manufacturers' Association intends to introduce a class cost of service study in this docket, provide the complete study including all workpapers cross referenced to source documents.

19. If the Chattanooga Manufacturers' Association intends to introduce a class cost of service study in this docket, provide a copy of each such study prepared during the past five years by the witness that will enter testimony relative to the study in this docket.

20. Produce copies of all documents or workpapers, prepared by or provided to any witness that may appear on behalf of the Chattanooga Manufacturers' Association in any hearing in this docket, that relate to the volume of gas projected to be purchased or transported during the July 2004-June 2005 attrition period by any member of the Chattanooga Manufacturers' Association.

21. Please provide the name, employer, position/title, business address and telephone number of any witness(s) that will testify on behalf of CMA in this docket.

Respectfully Submitted,

Chattanooga Gas Company

By:

A handwritten signature in cursive script, reading "D. Billye Sanders", is written over a horizontal line.

D. Billye Sanders, Esq.

Waller Lansden Dortch & Davis

A Professional Limited Liability
Company

511 Union Street, Suite 2700

Nashville, TN 37219

615-244-6380

Attorney Chattanooga Gas Company

CERTIFICATE OF SERVICE

I, hereby certify that on this 23rd day of April, 2004, a true and correct copy of the foregoing was delivered by hand delivery, or U.S. mail postage prepaid and email to the other Counsel of Record listed below.

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D. Billye Sanders, Esq.

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IN RE.

PETITION OF CHATTANOOGA GAS
COMPANY, FOR APPROVAL OF
ADJUSTMENT OF ITS RATES AND
CHARGES AND REVISED TARIFF

DOCKET NO 04-00034

DATA REQUESTS OF CHATTANOOGA GAS COMPANY TO GAS TECHNOLOGY INSTITUTE

Chattanooga Gas Company ("CGC") hereby serves its Data Requests to Gas Technology Institute ("GTI") to be answered in writing under oath.

DEFINITIONS

1. GTI means the Gas Technology Institute, and its members, including, but not limited to its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of GTI.
2. The terms “you and “your” refer to GTI.
3. The term “person” means any natural person, corporation, corporate division, partnership, limited partnership, other unincorporated association, trust, government agency, or entity.

4. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged).
- d) the identity of the author(s) and/or preparer(s) and the address(es) (if any) of any document withheld as privileged.

2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within GTI's possession, custody or control as well as in the possession, custody or control of GTI's agents, attorneys, members or other third parties from which such documentation may be obtained.

3. If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for your inability to respond fully. If you object to any part of a data request, answer all parts of the data request to which you do not

object, and as to each part to which you do object, separately set forth the specific basis for the objection.

4. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.

5. The answer to each data request should first restate the question asked and also provide the name and title and business address of the person or persons supplying the information.

DATA REQUESTS

1. On page 27 of his pre-filed testimony, Mr. Edelstein explains:
“Chattanooga Gas, with Authority oversight, will provide the final authorization as to where their research-funding dollars are applied from a list of candidate projects.” What will be the source of the list of candidate projects?

2. On page 29 of his pre-filed testimony, Mr. Edelstein explains:
“Chattanooga Gas, with Authority oversight, will have the ability to (1) choose specific R&D projects that will benefit its customers and (2) place these R&D dollars with GTI or other research organizations for customer-interested R&D purposes.”
What other research organizations could be candidates to receive such funding?

3. On page 28 of his pre-filed testimony, Mr. Edelstein states: “There are 15 states currently authorizing research funding for gas-consumer-interest R&D.”

Please provide copies of the applicable orders and/or rules issued by the regulatory agency in each state adopting such funding.

4. For each of the 15 states provide a summary of the accounting, reporting, and auditing requirements that have been adopted relative to the billing, collecting, accounting for, and disbursement of the funds collected through the GTI surcharge.

5. Provide a summary of the accounting, reporting, and auditing requirements currently in effect under the FERC oversight relative the billing, collecting, accounting for, and disbursement of the funds collected through the GTI surcharge.

6 Please summarize the accounting, reporting, and auditing requirements that GTI would recommend the TRA adopt relative to the billing, collecting, accounting for, and disbursement of the funds collected through the GTI surcharge.

7. In Tennessee, a large number of natural gas customers are served by municipal systems and natural gas utility districts that are not regulated the Tennessee Regulatory Authority. The Authority therefore can not require the customers of these systems and districts to participate in the funding of research and development. What per cent of the customers in each of the states listed on page 29 of Mr. Edelstein's testimony are served by utilities not subject rate regulation by the state utility commission?

8. Please identify the non-regulated natural gas systems in Tennessee that have volunteered to collect the surcharge for the funding of GTI and the

number of customers served by such systems. Please provide evidence of such voluntary commitment, if any, i.e., contract, etc.

9. Please provide a copy of the organizational document creating the GTI, e.g., the Charter or Articles of Organization.

10. Please provide a copy of the Bylaws of GTI or other comparable documents pertaining to governance.

Respectfully Submitted,

Chattanooga Gas Company
By:



D. Billye Sanders, Esq.
Waller Lansden Dortch & Davis
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Company
511 Union Street, Suite 2700
Nashville, TN 37219
615-244-6380
Attorney Chattanooga Gas Company

CERTIFICATE OF SERVICE

I, hereby certify that on this 23rd day of April, 2004, a true and correct copy of the foregoing was delivered by hand delivery, or U.S. mail postage prepaid and email to the other Counsel of Record listed below.



D. Billye Sanders, Esq.

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Tim Phillips
Assistant Attorney General
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